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**From:** Drude, Kevin  
**Sent:** Wed 5/20/2015 7:24:57 PM  
**Subject:** RE: Refugio Incident\_project description for emergency use permit

I have reviewed your project description with Dr. Russell, Director of Planning and Development, and he authorizes the ongoing emergency remedial actions listed below that fall within the jurisdiction of the County. Formal Emergency Permits will be issued shortly.

The County's environmental monitor, John Storrer, is onsite and will advise both Plains and emergency response personnel on the importance of adhering to the County's permit conditions of approval to the maximum extent feasible, as set forth in Final Development Plan 88-DP-033 and its numerous revisions. Of particular concern to the County is the protection of cultural, biological and other coastal resources that are being impacted by the oil spill and could further be impacted by the remedial activities. Mr. Storrer is there to provide guidance on minimizing those impacts as the emergency responders perform their duties.

Plains will be required to apply for the appropriate permits that would have otherwise been required outside of an emergency situation, including any necessary environmental review. Please contact Matt Young of my staff at 568-2513 or Errin Briggs at 568-2047 if you have any questions.

Kevin Drude

Deputy Director, Energy and Minerals Division

568-2519

**From:** James C Buchanan [mailto:JCBuchanan@paalp.com]  
**Sent:** Wednesday, May 20, 2015 10:31 AM  
**To:** Young, Matthew; Drude, Kevin  
**Cc:** Arndt, Elsa; 'rogow.michelle@epa.gov'; Randolph J Fordham; Ngiabi Gicuhi; Richard W Hartig; Kathleen M Randall; Darren J Palmer; 'john@ppcinc.biz'

**Subject:** Refugio Incident\_project description for emergency use permit

Good morning,

The following project description covers the general tasks involved with the clean-up, response, and remediation activities associated with the Refugio Incident. In addition, the following tasks will be associated with excavation and repair of the damaged pipeline (Line 901).

• Ocean clean-up:

- Activities include skimming crude from the water surface, collecting free floating crude near the shore, boom deployment at protected estuaries and along the shoreline
- Equipment includes several boats, helicopter (for aerial observation), boom, shoreline boom, boom deployment equipment and skimmers
- Staging/storage area: staged at Port Heuneme
- Decontamination site: at TNT yard at Port Heuneme

• Beach clean-up:

- Activities include pick-up and removal of impacted materials; potential decontamination of impacted wildlife, and environmental and cultural resources
- Equipment includes roll-off bins for collection of impacted materials, hand labor with buckets, shovels, and garbage bags; all-terrain vehicles (ATVs) will be utilized; however, no heavy equipment is involved with beach clean-up
- Staging/storage area: beach parking lot
- Decontamination site: beach parking lot

• Release site clean-up:

- Activities include collecting (vacuuming) crude from the release site, excavation of impacted soil for removal to roll-off bins, cleaning of the culvert and impacted areas leading down to the ocean; potential decontamination of impacted wildlife, and environmental and cultural resources

- Equipment includes roll-off bins, hydro-blaster, back hoe, heavy-duty trucks, and baker tanks and vacuum trucks

- Staging/storage area: at Freeport-McMoRan Gaviota Plant

- Decontamination site: at release site

- Pipeline evaluation and repair:

- Activities include excavating the pipeline at the release site to assess what repairs are necessary to repair the pipeline; subsequent to this evaluation, crews will weld a sleeve in-place or replace the damaged segment of pipe

- Equipment potentially includes, but may not be limited to, back hoes, excavators, hydro-excavator, crane, welding and heavy-duty trucks, other heavy equipment, and baker tanks and vacuum trucks

- Staging/storage area: at release site

- Decontamination site: at release site

- Other activities:

- In the event of a storm, it may be necessary to position dams and containment at watercourses (streams) that could be impacted by the incident

- Equipment potentially includes, but may not be limited to, containment boom, sand bags, and visqueen

All roll-off bins and baker tanks may be staged at the Freeport-McMoRan Gaviota Plant during (and subsequent to) clean-up and remediation activities. This project description has been reviewed by members of the Incident Command Unit, including Plains management, Elsa Arndt (SB County OEM), and Michelle Rogow (EPA).

Plains respectfully requests emergency authorization to proceed with the activities described above. Please contact me with any concerns, comments, or requests for additional information. Thank you.

**James Buchanan**

*Environmental & Regulatory Compliance Specialist*

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